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2 SUPREME COURT OF THE STATE OF NEW YORK  
3 COUNTY OF KINGS  
4 - - - - -  
5 STALIN RODRIGO REYES ESPINOZA,  
6 Plaintiff,  
7 -against-  
8 DAVS PARTNERS LLC AND KALNITECH  
9 CONSTRUCTION COMPANY,  
Defendants.

10  
- - - - -  
11  
Veritext Virtual  
12  
March 24, 2022  
13  
11:09 a.m.

15 CONTINUED EXAMINATION BEFORE TRIAL of  
16 STALIN RODRIGO REYES ESPINOZA, the  
17 Plaintiff in the above-entitled action,  
18 held at the above time and place, taken  
19 before Carol Ellinghaus, a Notary Public  
20 of the State of New York, pursuant to an  
21 Order and stipulations between Counsel.

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2 APPEARANCES:

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BY: KENNETH KLEIN, ESQ.

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LAW OFFICE OF MICHAEL SWIMMER  
Attorneys for Defendant  
Kalnitech Construction Company  
605 3rd Avenue, 9th Floor  
New York, New York 10158

BY: ROBERT BRIGANTIC, ESQ.

ALSO PRESENT: Alice Dow,  
Spanish Interpreter

\* \* \*

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1                   S. Espinoza

2       Q.     Was it the day before June 28 or  
3     something else?

4       A.     It could have been during that  
5     week but I don't remember exactly.

6       Q.     On June 28, 2019, the day of the  
7     accident on Friday, what time did you  
8     arrive at the building approximately?

9       A.     At eight in the morning.

10      Q.     How did you get there?

11      A.     They brought me in a van.

12      Q.     At that time you were working  
13     for Jim Associates?

14      A.     Yes.

15      Q.     Were there other Jim Associates  
16     employees or personnel on the job site on  
17     the day of the accident, June 28?

18      A.     Yes.

19      Q.     Tell me their names.

20      A.     No, I cannot because I don't  
21     know everyone's name and I don't remember.

22      Q.     How many other people were there  
23     from Jim Associates in addition to  
24     yourself?

25      A.     Just give me a minute so I can